

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

HANS A. QUAACK, ATTILIO PO
and KARL LEIBINGER, on behalf of themselves
and those similarly situated,
Plaintiffs,

No.: 03-CV-11566 (PBS)

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING CORP., SA),
Defendants.

STONINGTON PARTNERS, INC., a Delaware
Corporation, STONINGTON CAPITAL
APPRECIATION 1994 FUND L.P., a Delaware
Partnership and STONINGTON HOLDINGS, L.L.C., a
Delaware limited liability company,
Plaintiffs,

No.: 04-CV-10411 (PBS)

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING CORP., SA),
Defendants.

GARY B. FILLER and LAWRENCE PERLMAN,
Trustees of the TRA Rights Trust,
Plaintiffs,

No.: 04-CV-10477 (PBS)

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING CORP., SA),
Defendants.

JANET BAKER and JAMES BAKER, JKBAKER LLC
and JMBAKER LLC,
Plaintiffs,

No.: 04-CV-10501 (PBS)

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING CORP., SA),
Defendants.

DECLARATION OF ALLISON K. JONES IN SUPPORT OF
PLAINTIFFS' MOTION FOR RECONSIDERATION OF THE PORTION OF THE
JULY 10, 2006 ORDER DENYING PLAINTIFFS' MOTION TO COMPEL DEXIA
BANK BELGIUM TO PRODUCE PIET CORDONNIER FOR DEPOSITION

Allison K. Jones declares pursuant to 28 U.S.C. § 1746 that:

1. I am a member of the Bar of this Court and an associate of the law firm Berman DeValerio Pease Tabacco Burt & Pucillo, co-lead counsel for Lead Class Plaintiffs Hans A. Quaak, Attilio Po, and Karl Leibinger ("Plaintiffs") in *Quaak v. Dexia*, 03-CV-11566 (PBS), as captioned above. Unless otherwise indicated, I have personal knowledge of the matters addressed in this declaration. I am over the age of 18 and am fully competent to testify.
2. I submit this declaration in support of Plaintiffs' Memorandum of Law in Support of Their Motion for Reconsideration of the Portion of the July 10, 2006 Order Denying Plaintiffs' Motion to Compel Dexia Bank Belgium To Produce Piet Cordonnier for Deposition.
3. The Memorandum of Law and the instant Declaration have not been filed with the Court at this time because they contain evidence and annex documents that Dexia Bank Belgium has produced in discovery as "Confidential Information" subject to the terms of the Stipulation and Order Governing the Treatment of Confidential Information entered in each of the above-captioned actions on May 31, 2005 ("Confidentiality Order"). A true and correct copy of that Confidentiality Order is attached hereto as **Exhibit "A."** Under the terms of the Confidentiality Order, memoranda, declarations, documents and testimony containing or disclosing discovery materials that the producing party has designated as "Confidential Information" must be filed with the Court under seal. *See* Exhibit A at ¶ 10.
4. A true and correct copy of pages 246-247 of a transcript reflecting the deposition testimony of Jacques Janssens is attached hereto as **Exhibit "B."**
5. A true and correct copy of page 170 of a transcript reflecting the deposition testimony of Jacques Janssens is attached hereto as **Exhibit "C."**

6. A true and correct copy of select pages of a certified translation of the interrogation of Geert Dauwe before the Belgian Prosecutor is attached hereto as **Exhibit "D."** This document was produced by Dexia Bank Belgium and displays a Bates stamp of DBB 036129-38.

7. A true and correct copy of a certified translation of a document produced by Dexia Bank Belgium and displaying a Bates stamp of DBB 050204 is attached hereto as **Exhibit "E."**

8. A true and correct copy of a certified translation of a document produced by Dexia Bank Belgium and displaying a Bates stamp of DBB 003712 is attached hereto as **Exhibit "F."**

9. A true and correct copy of a certified translation of a document produced by Dexia Bank Belgium and displaying a Bates stamp of DBB 038067 is attached hereto as **Exhibit "G."**

10. A true and correct copy of pages 62-64 of a transcript reflecting the deposition testimony of Patrick Van Tiggel is attached hereto as **Exhibit "H."**

11. A true and correct copy of pages 112-113 of a transcript reflecting the deposition testimony of Patrick Van Tiggel is attached hereto as **Exhibit "I."**

12. A true and correct copy of pages 122-123 of a transcript reflecting the deposition testimony of Patrick Van Tiggel is attached hereto as **Exhibit "J."**

13. I hereby declare that the foregoing is true to the best of my knowledge, information and belief.

Dated this 24th day of July, 2006.

/s/ Allison K. Jones

Allison K. Jones